

# EXHIBIT G

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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 EDWARDO MUÑOZ, individually and on  
behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 7-ELEVEN, INC., a Texas corporation,

17 Defendant.

18 Case No. 2:18-cv-03893 RGK (AGR)

19 **DECLARATION OF JULIE R.  
TROTTER IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT OR IN THE  
ALTERNATIVE SUMMARY  
ADJUDICATION**

20 *[Filed concurrently with Notice of Motion  
and Motion for Summary Judgment,  
Statement of Uncontested Facts,  
Declaration of K. Cope, Request for  
Judicial Notice, and [Proposed]  
Judgment]*

21 Date: May 13, 2019

22 Time: 9:00 a.m.

23 Place: Courtroom: 850

24 Complaint Filed: May 9, 2018  
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Trial Date: July 2, 2019

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**CALL &  
JENSEN**  
EST. 1981

## **DECLARATION OF JULIE R. TROTTER**

I, Julie R. Trotter, declare as follows:

1. I am a shareholder with the law firm of Call & Jensen, APC, which is counsel of record for Defendant 7-Eleven, Inc. ("7-Eleven") in this matter. I have personal knowledge of the matters contained in this declaration and, if called on as a witness, I could and would testify competently as to the matters set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the excerpts cited from Plaintiff's February 20, 2019 deposition.

9       3. Attached hereto as **Exhibit B** is a true and correct copy of Exhibit 7 from  
10 Plaintiff's February 20, 2019 deposition.

11       4. Attached hereto as **Exhibit C** is a true and correct copy of Exhibit 16 from  
12 Plaintiff's February 20, 2019 deposition.

I declare under penalty of perjury, under the laws of the State of California and the United States, that the foregoing is true and correct. Executed on April 8, 2019, at Newport Beach, California.

/s/ Julie R. Trotter  
Julie R. Trotter

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# EXHIBIT A

DEPOSITION OF EDWARDO LEE MUNOZ  
Newport Beach, California  
Wednesday, February 20, 2019

18 REPORTED BY: Michelle Milan Fulmer  
CSR No. 6942, RPR, CRR, CRC

Page 1

1 Q Okay. You ended up working for 7-Eleven  
2 for a few weeks; right? It's like six weeks or so?

3 A Yes.

4 Q Maybe less. All right.

5 Why did you decide to apply to the 10:41:50  
6 7-Eleven?

7 A To get a job.

8 Q How did you find out about that opening?

9 A A friend.

10 Q Who's your -- who was the friend? 10:42:02

11 A I forgot his name.

12 Q So an acquaintance --

13 A Yeah.

14 Q -- more than a friend?

15 A Yeah. 10:42:16

16 Q Was he someone that worked at 7-Eleven?

17 A Yes.

18 Q Was he working at that same store?

19 A Yes.

20 Q Where is the store located? 10:42:21

21 A In Pasadena.

22 Q So Pasadena I have heard of. That's pretty  
23 far from Merced; right?

24 A Yes.

25 Q Were you living in Merced at the time? 10:42:29

1 A I had an interview.  
2 Q Okay. And how did they set up the  
3 interview? Did they call you? Did they email you?  
4 A They called me.  
5 Q Called. 11:01:23  
6 Do you recall who called you?  
7 A I believe it was Mike.  
8 Q Do you know Mike's last name?  
9 A No, I do not.  
10 Q Was he the store manager? 11:01:31  
11 A Yeah, the store manager.  
12 Q Okay. He called you on your cell phone;  
13 right?  
14 A Yes.  
15 Q You provided that information? 11:01:42  
16 A Yes.  
17 Q And then what did he say?  
18 A He'd like for me to come in for an  
19 interview.  
20 Q Okay. And so you applied January 16. When 11:01:55  
21 do you think the call came in from Mike about the  
22 interview?  
23 A It was, what, the day after.  
24 Q Okay. And then when did you interview,  
25 best estimate? 11:02:08

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1 all okay?

2 A Yes.

3 Q Okay. How did the interview with Mike end?

4 What were -- what were the results?

5 A He told me that he would call me back in a 11:06:42  
6 couple days to see if I had the job.

7 Q Okay. Do you know what he needed to do,  
8 why he didn't just offer it to you right then?

9 A He said he needed to do the background 11:06:56  
10 check.

11 Q Okay. What did you say to that?

12 A I said, "Okay."

13 Q Did you ask any questions about it, what it  
14 would entail?

15 A No. 11:07:12

16 Q And so he said, "I'll need to run the  
17 background check, but I'll call you back in a few  
18 days"?

19 A Yes.

20 Q Okay. What -- 11:07:21  
21 When did he call you back?

22 A Probably like maybe three days after that.

23 Q And what did he say?

24 A He said that I had got the job. My  
25 background pass checked. My background check 11:07:37

1 passed.

2 Q He told you straight up on the phone you  
3 passed the background check?

4 A Yes. That's why they hired me.

5 Q Were you surprised that you passed the 11:07:52  
6 background check?

7 A I wasn't surprised.

8 Q Did you say anything about the fact you had  
9 a criminal history, just a misdemeanor?

10 A No. 11:08:19

11 Q Didn't bring it up?

12 A No.

13 Q No reason to; right?

14 A No reason to.

15 Q But you were okay with him running the 11:08:24  
16 background search?

17 A Yeah.

18 Q You understood when he said, "I've got to  
19 run the background search," that it could result in  
20 you not getting the job; right? 11:08:39

21 A Yes.

22 Q But you were still okay with him running  
23 it?

24 A Yes.

25 Q Okay. Okay. Let's look at -- 11:08:45

1 A No.

2 Q All right. Okay. You can set that aside.

3 We've been going like an hour 20. Do you  
4 want to break for a sec?

5 MR. PELUSO: Sure.

11:18:27

6 MR. CHRISTENSEN: We're moving pretty good,  
7 so --

8 THE VIDEOGRAPHER: Going off the record.

9 The time is 11:18 a.m.

10 (Recess taken.)

11:18:38

11 (Off the record at 11:18 a.m. Back on the  
12 record at 11:29 a.m.)

13 THE VIDEOGRAPHER: Back on the record. The  
14 time is 11:29 a.m.

15 MR. CHRISTENSEN: All right. Exhibit 7.

11:29:30

16 (Whereupon, Deposition Exhibit 7 was marked  
17 for identification by the Certified Shorthand  
18 Reporter, a copy of which is attached hereto.)

19 BY MR. CHRISTENSEN:

20 Q Okay. Let's look at another exhibit here.

11:29:48

21 So Exhibit 7 is Bates labeled MUNOZ 6 and  
22 it's an email dated January 24, 2018, titled,  
23 "7-Eleven New Hire Paperwork."

24 Do you remember receiving this email?

25 A Yes.

11:30:12

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1 Q And that's --

2 It went to your email address there; right?

3 A Yes.

4 Q The one listed there. Okay.

5 And did you read it?

11:30:22

6 A Yes.

7 Q What was your understanding of what you  
8 needed to do with this email, if anything?

9 A Do my I-9.

10 Q Okay. What's an I-9?

11:30:33

11 A The W-2s. Right?

12 Q Okay. Some of the tax documents?

13 A Yes.

14 Q Okay. I think it's also some immigration  
15 paperwork that -- maybe a Social Security card or  
16 something. I don't know. We're not held to that.

11:30:45

17 Neither of us know the answer to that. How  
18 about that?

19 A Yeah.

20 Q Okay. All right. Let's read this first  
21 paragraph together. It says, "Welcome to 7-Eleven.  
22 To ensure your career gets off to a great start, you  
23 must complete important payroll and new hire  
24 paperwork, which may be accessed at the Employment  
25 Center," and Employment Center is underlined;

11:31:18

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1 Q Okay.

2 A Yes.

3 Q So we saw application, January 16. Then  
4 you get a call from Mike; right?

5 A Yes.

11:32:21

6 Q You interviewed a day or two before  
7 January 24th; right?

8 A Yes.

9 Q Then you get this new hire paperwork  
10 January 24; right?

11:32:30

11 A Yes.

12 Q Okay. Did you have any trouble accessing  
13 this site, the new hire paperwork?

14 A No.

15 Q Okay. Did you notice, though, if you did,  
16 in the middle of this email it says, "If you have  
17 any difficulty accessing the site or questions about  
18 the new hire documents, please contact HR at" a  
19 1-800 number?

11:32:40

20 A Yes.

11:32:56

21 Q Did you notice that?

22 A Yes.

23 Q Did you ever contact that number?

24 A No.

25 MR. CHRISTENSEN: Okay. Okay. Let's do

11:33:03

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1 Q Okay.  
2 A Yeah.  
3 Q To who knows where?  
4 A Yeah.  
5 Q All right. So what did you do once you 11:47:25  
realized I can't -- can't access it from my phone?  
6 A My -- I asked -- I asked if I could use a  
7 computer.  
8 Q Did you call someone and ask?  
9 A Yeah. At the store, yeah. 11:47:40  
10 Q Okay. Who did you call at the store?  
11 A Mike.  
12 Q Okay. You asked Mike if you could come in  
13 and use their computer --  
14 A Yes. 11:47:49  
15 Q -- to fill out the new hire paperwork?  
16 A Yes.  
17 Q And where is the computer located that you  
18 used to do --  
19 A In their office. 11:47:58  
20 Q Like in the back room --  
21 A Yeah.  
22 Q -- or something?  
23 A Yeah. Okay.  
24 Q You're there about 40 minutes, you say? 11:48:03  
25

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1 A Yes.

2 Q And it was January 26, 2018?

3 A Yes.

4 Q I think --

5 Do you remember what day of the week that 11:48:12  
6 is?

7 A No, I don't.

8 Q Who knows? Okay.

9 I think it was a Monday.

10 A Monday. Yeah. Monday or Wednesday. One 11:48:18  
11 of those.

12 Q Why do you say Monday or Wednesday?

13 A Because I -- I think it was either on a  
14 Monday or a Wednesday.

15 Q Okay. I thought you like had something 11:48:27  
16 triggering your mind where you just -- okay. Fair  
17 enough.

18 So was Mike in the store at the same time  
19 you were there filling out the paperwork?

20 A Yes. 11:48:39

21 Q Did you ever say, "Hey, Mike, I don't  
22 understand what this is even asking me"?

23 A No.

24 Q Could you have done that if you wanted to?

25 A Yes. 11:48:52

1 You didn't dispute the report; right?

2 A No.

3 Q Okay. Let's look at the report just  
4 briefly.

5 So go to it's like the third page, 12:15:09

6 SEV 29. There's a lot of language. I don't want to  
7 spend time reading it all; but if you feel like you  
8 want to, you certainly can.

9 In the middle of the box -- or in the  
10 middle of that page, though, it has your name, 12:15:27  
11 refers to your Social Security number, and your  
12 address.

13 That's all you; right?

14 A Yes.

15 Q That's all correct information? 12:15:38

16 A Yes.

17 Q Okay. Switch to the next page. Actually,  
18 okay. Towards the bottom of that page. So we're on  
19 SEV 30. Oh, no. Next page. Sorry about that.

20 MR. PELUSO: When page are we on? 12:16:08

21 MR. CHRISTENSEN: Good question.

22 Q We're going to move to SEV 31. Okay. So  
23 this shows -- and I know this is the first time  
24 you're seeing this document. So I'll just kinda  
25 walk you through my understanding of it. 12:16:23

1 You can set that one aside.

2 (Whereupon, Deposition Exhibit 16 was  
3 marked for identification by the Certified Shorthand  
4 Reporter, a copy of which is attached hereto.)

5 BY MR. CHRISTENSEN: 01:35:12

6 Q All right. So I've handed you Exhibit 16,  
7 which is a declaration filed on your behalf.

8 Have you seen this document before?

9 A Yes.

10 Q And at the second-to-last page, 01:35:26  
11 third-to-last page there is your electronic  
12 signature; right?

13 A Yes.

14 Q Okay. Do you know what the purpose of this  
15 document is or was? 01:35:42

16 A For me to -- basically like for my rights.

17 Q Okay. Do you know what -- why this was  
18 filed with the court?

19 A No, I do not.

20 Q Okay. Did you write this document? 01:36:00

21 A No.

22 Q It was written for you; right?

23 A Yes.

24 Q And then did you have a chance to review  
25 it, though, before signing it? 01:36:13

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Hahn & Bowersock, A Veritext Company  
800.660.3187

1 what application means.

2 Remember when we looked at the actual  
3 application that you filled out --

4 A Yeah.

5 Q -- dated January 16? 01:38:30

6 A Yes.

7 Q And then we looked at the new hire  
8 documents that you filled out January 26th; right?

9 A Yes.

10 Q Okay. The disclosure, if you look it's 01:38:39  
11 right here attached to your declaration, that was  
12 part of the new hire documents January 26th; right?

13 A Yes.

14 Q Okay. So in between that time period,  
15 you'd actually had an interview with Mike; right? 01:38:57

16 A Yes.

17 Q And so you actually filled this out in  
18 connection with the new hire documents; right?

19 A Yeah.

20 Q Okay. 01:39:07

21 A Okay. Yeah.

22 Q And then here it says, "Attached is a true  
23 and correct copy of the disclosure," and that's  
24 Exhibit A here Bates labeled 7-ELEVEN 3; is that  
25 right? 01:39:26

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1 A Yes.

2 Q That's the disclosure we're talking about?

3 A Yes.

4 Q Okay. All right. Let's look at

5 Paragraph 4. It says, "The disclosure contained an 01:39:43  
6 excessive amount of information in fine print."

7 What did you -- what do you mean

8 by "excessive information," "excessive amount of  
9 information"?

10 A As in -- as in not being -- not being just 01:39:59  
11 one simple -- one simple -- like how do you say  
12 it -- allegation or, no, like one simple thing.

13 Q Okay. So my -- I would define excessive as  
14 like too much.

15 A Yeah, too much. 01:40:31

16 Q Is that a fair definition --

17 A Yeah, too much.

18 Q -- of the word excessive?

19 So you're saying it contained too much  
20 information; is that right? 01:40:38

21 A Yes.

22 Q Okay. When did you form the opinion that  
23 there's too much information on the disclosure?

24 A When?

25 Q Uh-huh. 01:40:53

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1 Q So it's not really fine print. Is it fine  
2 print, in your opinion?

3 A Yeah, because it's small. It's --

4 Q Just because it's small?

5 A Yeah. 01:43:07

6 Q That's what you mean. Okay.

7 All right. Back to your declaration,

8 Paragraph 4. "As a result of the excessive  
9 information, I was confused as to both what the  
10 purpose of the disclosure was and what it actually 01:43:24  
11 authorized."

12 You understood there was a purpose to the  
13 disclosure; right? You just were confused what that  
14 purpose might be?

15 A As in -- as in being a simple criminal 01:43:47  
16 background check, yes. That's what I thought.

17 Q You understood it was --

18 You thought it was just a simple criminal  
19 background check? That's what you're saying?

20 A Yes. 01:44:03

21 Q Okay. What do you mean by a simple  
22 criminal background check?

23 A As in like a background check. That's -- I  
24 thought it was just a simple background check that  
25 everybody gives you. 01:44:17

1 Q Okay.

2 A And --

3 Q And your understanding now is that's not  
4 the case?

5 A Yeah. 01:44:24

6 Q What -- what makes it different than what  
7 everybody else does?

8 A Where -- where everybody can contact  
9 whoever or whomever and -- and if I would have known  
10 that, like I probably wouldn't have signed it. 01:44:47

11 Q Okay. So your testimony is, look, I  
12 thought they were going to run like a public records  
13 search or something.

14 A Yeah.

15 Q I didn't know they would be contacting -- 01:45:04

16 A Like my grandma, my -- you know, like --

17 Q -- contacting witnesses or something?

18 A Yeah.

19 Q Okay. And if it's just a criminal  
20 background search, you have no problem with that, 01:45:21  
21 though; right?

22 A Yes.

23 Q It's when they do more, to go contact other  
24 witnesses and whatever else?

25 A Yes. 01:45:28

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1 Q If you were to learn that 7-Eleven actually  
2 didn't contact witnesses and only did what you call  
3 a simple criminal background check, would you still  
4 be upset?

5 MR. PELUSO: Objection. Calls for 01:45:41  
6 speculation.

7 THE WITNESS: No.

8 BY MR. CHRISTENSEN:

9 Q Okay. You also say in here that you were 01:45:59  
10 confused what it actually authorized.

11 And I think that's kinda we're talking  
12 about the same thing again. You're saying I'm okay  
13 if they run the background search and find out about  
14 my misdemeanor, but I don't -- I don't want them  
15 talking to witnesses and things. 01:46:14

16 A Yes.

17 Q That's what you're saying?

18 A Yes.

19 Q And you were confused that this form 01:46:20  
20 authorized them to do that?

21 A Yes.

22 Q Okay. All right. Paragraph 5 you say,  
23 "Despite not understanding the nature of the  
24 information that would be disclosed, I chose to  
25 execute the disclosure to continue with the 01:46:55

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1 application process."

2 That's still true, in your opinion?

3 A Yes.

4 Q And, again, the nature of the information  
5 is the talking to witnesses; right? 01:47:07

6 A Yes.

7 Q Okay. You then say, Paragraph 6, "Starting  
8 on January 26, 2018, I began my employment with  
9 7-Eleven."

10 It was actually January 30th; right? 01:47:24

11 A Yes.

12 Q Okay. And then, "Approximately one month  
13 later, on or around February 21st, 7-Eleven informed  
14 me that I was terminated based upon information  
15 contained in my background check." 01:47:37

16 That's still true; right?

17 A Yes.

18 Q That's accurate. Okay.

19 "In short, had I understood the information  
20 that would be provided to 7-Eleven, I would not have 01:47:48  
21 signed the disclosure."

22 Again, the information is not the -- not  
23 the misdemeanor, but additional information beyond  
24 that; right?

25 A Yes. 01:48:00

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1 Q And that's still true?

2 A Yes.

3 Q Had it been limited to just we're just  
4 going to look up public records, criminal history --  
5 I don't know -- you have no problem signing that; 01:48:11  
6 right?

7 A Yes.

8 Q And, in fact, you told Mike, "Yeah. Go  
9 ahead and run a background search"?

10 A Yes.

01:48:19

11 Q Okay. All right. Let's look at the  
12 disclosure here.

13 MR. PELUSO: Just sticking with the same  
14 exhibit? Yeah.

15 MR. CHRISTENSEN: I guess so. Yeah. We're 01:48:34  
16 on it, I guess. Actually, no, you're probably  
17 right.

18 Okay. Let's grab -- if you have Exhibit 8  
19 lying around. Or you know what? I might have a  
20 better one here. 01:48:56

21 That's okay. All right. We'll stick to  
22 this exhibit. If we have to bounce around, we'll do  
23 it, but we'll try to make this simple.

24 Q All right. So we're still on Exhibit --

25 MR. PELUSO: 16, I think. 01:49:12

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1 THE COURT REPORTER: Yes.

2 BY MR. CHRISTENSEN:

3 Q 16. Thank you.

4 All right. This is the disclosure and this  
5 is the disclosure you say you were confused by; 01:49:18  
6 right?

7 A Yes.

8 Q And did you read this disclosure?

9 A Yes.

10 Q Word for word? 01:49:32

11 A No.

12 Q How much of this disclosure did you read?

13 A About the first, first sentence, first  
14 couple sentences. Yeah.

15 Q First couple sentences. Okay. 01:49:48

16 Let's -- let's go through so you can show  
17 me what you read exactly, and then we'll talk to  
18 what you understood. All right.

19 Okay. So the heading, and it's kinda  
20 covered up by the court stamp, but it 01:50:08  
21 says, "Disclosure Regarding Background  
22 Investigation."

23 Did you read that?

24 A Yes.

25 Q And did you understand what that was? 01:50:18

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1 A No.

2 Q You didn't understand what that meant?

3 A No.

4 Q What did you think it meant?

5 A I thought it was just a background check. 01:50:27

6 Q Okay. And is it your understanding now  
7 that it's not?

8 A Yes.

9 Q And the reason why, why do you think it's  
10 not a background check? 01:50:41

11 A Because what it says right here, it says  
12 consumer report, background report, and the  
13 investigative consumer report --

14 Q Okay.

15 A -- which I have no idea of what those are. 01:50:52

16 Q Okay. Okay. So you first see, "Disclosure  
17 Regarding Background Investigation," and you're  
18 saying I don't know what background investigation  
19 means?

20 A Yeah. 01:51:04

21 Q You, at least, understood it was some kind  
22 of investigation into your background, though;  
23 right?

24 A Yes.

25 Q And you agree that that suggests it's maybe 01:51:11

1 even broader than just a criminal history search;  
2 right?

3 A Yes.

4 Q All right. So then you -- you read this  
5 first sentence, you say? 01:51:24

6 A Yes.

7 Q And, again, this is -- just so I'm clear,  
8 you're at the 7-Eleven office on the computer;  
9 right?

10 A Yes. 01:51:32

11 Q Reading this.

12 Okay. So let's read this first sentence  
13 together. "For the purpose" --

14 Or actually will you read it, the first  
15 sentence? 01:51:41

16 A "For the purpose of maintaining the safety  
17 and security of our stores, customers, employees,  
18 and property, 7-Eleven, Inc., may order a consumer  
19 report, background report or investigate" --  
20 "investigative consumer report on you in connection 01:51:56  
21 with application for employment on your ongoing  
22 employment with 7-Eleven."

23 Q Okay. Good. So that's the sentence you  
24 read at the time?

25 A Yes. 01:52:11

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1 Q And I think I understand you're saying you  
2 didn't understand what this sentence was saying?

3 A Yes.

4 Q Okay. What about it don't you understand?

5 A I don't know what a consumer report is, 01:52:29  
6 background report or investigative consumer report.

7 Q Okay. At the time did you have any thought  
8 as to what those might mean?

9 A I just thought it was a background check.

10 Q Just a background check, like you're saying 01:52:50  
11 public records check or whatever?

12 A Like every other -- every other application  
13 that I've done.

14 Q Yeah.

15 A I thought it was the same thing -- 01:52:59

16 Q Okay.

17 A -- with the background check.

18 Q Okay. But those phrases -- consumer  
19 report, background report, investigative consumer  
20 report -- those were foreign to you? 01:53:10

21 A Yes.

22 Q Okay. Did you say, "Mike, man, I don't  
23 know what this means. What are they talking about,  
24 a consumer report, investigative consumer report"?

25 A No. 01:53:23

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1 Q Was there anything keeping you from asking  
2 Mike about that?

3 A No.

4 Q And nothing keeping you from using your  
5 cell phone and calling HR, like the email said; 01:53:31  
6 right?

7 A No.

8 Q Okay. So after reading this, did you  
9 continue reading on?

10 A I just seen the background check and I 01:53:43  
11 signed and that was it.

12 Q Okay.

13 A And then --

14 Q So you read the first paragraph, said looks  
15 like a background search to me, I'm cool with it, 01:53:55  
16 signed, hit next and moved on?

17 A Yes.

18 Q So overall that took, what, about 30  
19 seconds?

20 A Yeah, about. 01:54:07

21 Q Okay. And didn't think twice about it.  
22 Just hit next and moved on; right?

23 A Yeah.

24 Q And the next thing you heard was something  
25 from Mike in the text? 01:54:23

1 A Well, first, first they hired me saying  
2 that my background passed.

3 Q Well, hold on. Is that true or -- I  
4 thought Mike called you and said your background  
5 passed and then you filled out these forms. 01:54:39

6 A No.

7 Q So you filled out the forms and then you  
8 got the call to say, hey, your background passed?

9 A Yes.

10 Q Okay. So they hired you, you worked, and 01:54:52  
11 then after a few weeks let go; right?

12 A Yeah.

13 Q All right. Let's -- I think it's important  
14 when your testimony is you were confused by what  
15 this form is, is to understand what you would have 01:55:16  
16 understood had you continued reading the whole  
17 thing.

18 So let's read through it and we'll talk  
19 through it a little bit. All right?

20 Next paragraph here. So the second 01:55:31  
21 paragraph at the top says, "The consumer reporting  
22 agency, Sterling Talent Solutions, Inc., will  
23 prepare the report for 7-Eleven, Inc."

24 Do you understand that sentence?

25 A Yes. 01:55:50

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1 Q Okay. "Sterling Talent Solutions, Inc., is  
2 located at," says their address, "and can be reached  
3 at," their phone number.

4 Do you understand that sentence?

5 A Yes. 01:56:02

6 Q Okay. And you understand that  
7 Sterling Talent Solutions is going to be doing this  
8 background report, whatever? Whatever it may be,  
9 they're the ones going to be doing it; right?

10 A Yeah. 01:56:16

11 Q They will prepare the report; yes?

12 A Yeah.

13 Q Okay. And then it says, "Further  
14 information regarding Sterling Talent Solutions,  
15 including its privacy policy, may be found online 01:56:27  
16 at," their web address.

17 You understand that sentence?

18 A Yes.

19 Q Okay. Then it says, "7-Eleven reserves the  
20 right to use a different service provider to obtain 01:56:37  
21 this information as it deems necessary."

22 Do you understand that one?

23 A Kinda.

24 Q What don't you understand?

25 A It says, "the right to use a different 01:56:49

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1 service provider to obtain this information."

2 So what that -- so basically they're  
3 saying, what, they can -- they can go -- not --  
4 wait. So they're using somebody else basically.

5 Q Well, they could use someone else; right? 01:57:14  
6 They say we could choose someone else. We reserve  
7 that right.

8 A Yeah.

9 Q You get that. Okay.

10 And then the next sentence says, "If a 01:57:23  
11 different agency is used, 7-Eleven will provide you  
12 with the contact information for the agency."

13 Do you understand that?

14 A Yes.

15 Q So if they decide to not use Sterling, 01:57:33  
16 they'll tell you; right?

17 A Yeah.

18 Q Okay. All right. Let's move on.

19 Will you read the next sentence for me on  
20 the start of the third paragraph? 01:57:44

21 A "The report may contain information from  
22 federal, state, and other agencies, learning  
23 institutions, information service bureaus,  
24 past/present employers, and other individuals or  
25 sources concerning your character, general 01:57:59

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1 reputation, personal characteristics, mode of  
2 living, work habits and/or creating" -- "credit  
3 standing."

4 Q Yeah. Okay.

5 So do you understand that sentence? 01:58:14

6 A Yes.

7 Q Okay. It's essentially saying you  
8 understand that they're going to -- they may look at  
9 federal, state or other agencies, learning  
10 institutions, like schools; right? 01:58:28

11 A Yes.

12 Q Other past/present employers; right?

13 A Yes.

14 Q It's just telling you the sources of what  
15 they might look at; right? 01:58:35

16 A Yes.

17 Q All right. And they're going to also --  
18 they'll look it at, try to learn about your  
19 character; right? And it goes on work habits,  
20 credit standing, all of those things. You  
21 understand what that's saying; right? 01:58:48

22 A Yeah.

23 Q Okay. And then it goes on. Will you read  
24 the next sentence?

25 A "Such information include your driving 01:58:58

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1 history, credit history, education, records of  
2 military service, insurance claims involving you,  
3 your criminal history and employment history,  
4 including the reasons for termination."

5 Q Okay. You understand that sentence? This 01:59:23  
6 is the type of information they're going to look  
7 for?

8 A Yeah.

9 Q Okay. And you actually have no problem  
10 with that, right, that they look at criminal 01:59:40  
11 history? No problem; right?

12 A No.

13 Q Employment history, no problem obviously?

14 A No.

15 Q Driving history? 01:59:47

16 A Never.

17 Q But you don't have a problem if they look  
18 at it; right?

19 A No.

20 Q Okay. Credit history? 01:59:58

21 A No.

22 Q Education history?

23 A No.

24 Q No problem?

25 No problem, records of military service or 02:00:05

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1 insurance claims; right?

2 A No.

3 Q Okay. Yeah.

4 Okay. So you understand that. All right.

5 Keep going on with this next sentence. 02:00:16

6 A "The information contained in the report  
7 may be obtained from private and public record  
8 sources, and the investigation can also involve  
9 personal interviews with sources, such as current  
10 and past employers, friends, family members, and 02:00:39  
11 associates."

12 Q Okay. Do you understand that sentence?

13 A Yes.

14 Q Okay. They're saying we might do these --  
15 we might look at private sources, personal 02:01:00  
16 interviews, current and past employers, talk to  
17 friends, families. They might do those things;  
18 right? You understand that reading that sentence;  
19 right?

20 A Yes. 02:01:12

21 Q Okay. Let's go to the next sentence.

22 A "Information included, the report will only  
23 be requested when permitted by the law and where  
24 such information is substantially related to the  
25 duties and responsibilities of the position for 02:01:33

1 which you are applying."

2 Q Okay. You understand that one?

3 A Kinda, sort of, yes. Yeah.

4 Q Yeah. Okay.

5 Let's go to the next one.

02:01:50

6 A By law.

7 Q It starts there, "7-Eleven Inc."

8 A "7-Eleven, Inc., will not obtain

9 information about your credit history, credit

10 worthiness, credit standing, or credit capacity

02:02:07

11 unless permitted by applicable state and local law."

12 Q Yeah. Good.

13 You understand that one?

14 A Yeah.

15 Q Do you know if they looked at any of your

02:02:18

16 credit history, worthiness, anything like that?

17 A I don't think so.

18 Q Okay. And then let's do this last sentence

19 here.

20 A "You have the right, upon written request

02:02:29

21 made within a reasonable time after receipt of this

22 notice, to request disclosure of the nature and

23 scope of any investigative consumer report from

24 7-Eleven, Inc."

25 Q Okay. You understand that one?

02:02:46

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1 A Yeah.

2 Q Yeah. Okay.

3 So as you read that now, does it help you  
4 see that these kinda weird terms -- consumer  
5 report, background report, investigative consumer 02:03:00  
6 report -- are then explained below saying, look,  
7 we're going to look at sources, look into your  
8 character, general reputation, we might do personal  
9 interviews? Does that help you understand what the  
10 report might look like? 02:03:16

11 MR. PELUSO: Objection as to the form.

12 THE WITNESS: Kind of. Not really, I mean.

13 BY MR. CHRISTENSEN:

14 Q What confuses you about that?

15 A Because like is it all of them put into one 02:03:30  
16 or --

17 Q All of what put into one? Sorry.

18 A -- or is it just -- is it consumer report  
19 or is it a background report or is it an  
20 investigative report -- 02:03:45

21 Q Okay.

22 A -- or is it just all of them put  
23 together --

24 Q Sure. So your concern --

25 A -- basically? 02:03:51

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1 Q Your concern is the name of this report;  
2 right?

3 A Yes.

4 MR. PELUSO: Mischaracterizes the  
5 testimony.

02:03:57

6 MR. CHRISTENSEN: He said, "Yes."

7 Q So you're saying, look, what's the name of  
8 this report? Is it a consumer report, background  
9 report, investigative consumer report?

10 A Or is it just a background check?

02:04:07

11 Q Okay. But as you read --

12 A Yeah.

13 Q As we read through it and you understood  
14 every single sentence, you can see what the report  
15 is going to entail; right? So whatever the name --  
16 maybe they want to call it the background  
17 investigation. Whatever the name, it doesn't  
18 matter. It says what they're going to look at;  
19 right?

02:04:16

20 A Yes.

02:04:30

21 Q And you understood --

22 Had you read this paragraph, you would have  
23 understood, look, they might -- doesn't say they  
24 will, but they might talk to friends, do personal  
25 interviews, things like that; right? You understand

02:04:43

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1 reading that?

2 A Yes.

3 Q Okay. Let's read the -- you see where it  
4 says, "Background Check Authorization"?

5 A Yes.

02:04:57

6 Q That big heading. Sorry. I'm trying to  
7 make it for the record, too.

8 Did you read this heading?

9 A Yes. "Background Check --

10 Q I'm sorry. That was a bad question.

02:05:08

11 A -- Authorization"?

12 Q Yeah. Let me go back.

13 A Yes, I did.

14 Q Okay. All right.

15 You mentioned earlier when you were doing

02:05:16

16 the paperwork you got to -- after the first  
17 paragraph, you then just skipped -- you hit next;  
18 right?

19 A Yeah. I seen background check, you know.

20 Q Okay. So you didn't actually read

02:05:30

21 "Background Check Authorization" at the time you  
22 were sitting in the 7-Eleven office filling out the  
23 paperwork; is that right?

24 A That's right.

25 Q Okay. So let's look at it now to see what

02:05:41

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1 it authorizes.

2 All right. Will you read that first  
3 sentence there?

4 A "I have carefully read and understand the  
5 preceding disclosure and the below authorization 02:05:55  
6 form. In --"

7 Q Okay. Let's stop there.

8 You understand what that's saying, that you  
9 read it and you understand the preceding disclosure?

10 A Yes. 02:06:12

11 Q Okay. Now, I'm sorry. I cut you off.

12 Will you go with, "In connection"?

13 A "In connection with and for the duration of  
14 my employment (including contract for services) with  
15 7-Eleven, Inc., I authorize and understand that 02:06:29  
16 investigative background inquiries or" -- "and/or  
17 consumer report inquiries may be made about me to the  
18 extent permitted by applicable federal, state, and  
19 local laws."

20 Q Okay. Do you understand that sentence? 02:06:51

21 A Yeah.

22 Q Okay. Keep going. This is super boring, I  
23 know. We're almost done.

24 A "In connection with these inquiries, I  
25 consent that 7-Eleven, Inc., may obtain consumer, 02:07:12

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Hahn & Bowersock, A Veritext Company  
800.660.3187

1       criminal, driving, education, employment and other  
2       reports at any time prior and during" -- "and/or  
3       during my employment to the work habits" -- wait.  
4       Did I skip a line? "Employment to extent permitted  
5       by law" -- "by applicable law." 02:07:35

6           Q     All right.

7           A     Yeah. I did miss one.

8           Q     You understand what that's saying? You  
9       consent that they may obtain reports about consumer,  
10      criminal, driving, education, employment, other 02:07:49  
11      reports?

12       A     Yes.

13       Q     Okay. Let's keep going.

14       A     "These reports may include information as  
15      to my character, general reputation, personal 02:08:00  
16      characteristics, mode of living, work habits, credit  
17      standing, driving history, credit history, education  
18      history, military service record, criminal history  
19      and employment history, including the reasons for  
20      termination." 02:08:22

21       Q     Okay. You understand that line?

22       A     Yeah.

23       Q     And you understand, it says "these  
24      reports," could be multiple reports and they're  
25      going to be about or could be about your character, 02:08:32

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1 reputation, what does it say, credit standing,  
2 driving history, all those things; right? That's  
3 what the reports could be?

4 A Yes.

5 Q Okay. All right. Let's keep going. 02:08:44

6 A "Further, I understand that I hereby  
7 authorize 7-Eleven, Inc., to request information  
8 from various federal, state, and other concerning my  
9 past activities."

10 Q Okay. You understand that? 02:09:02

11 A Yeah.

12 Q All right. Let's keep going. Finish it  
13 off.

14 A "These reports may relate to my driving  
15 record, criminal record, credit, civil and other 02:09:11  
16 experiences, as well as information in the files of  
17 insurance companies pertaining to claims involving  
18 me."

19 Q All right. You get that one?

20 A Yeah. 02:09:25

21 Q Okay. Again, it's just describing what  
22 these reports may contain; right?

23 A Yes.

24 Q Okay. Let's -- let's read that next one,  
25 then I think we're good. 02:09:42

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Hahn & Bowersock, A Veritext Company  
800.660.3187

1 A "By electronically signing below, I consist  
2 (sic) to the preparation of background reports by  
3 Sterling Talent Solutions, and to the release of  
4 such reports to 7-Eleven, Inc., and its designated  
5 representatives for the purpose of assisting 02:10:00  
6 7-Eleven, Inc., in making a determination as to my  
7 employment, promotion, retention, contract  
8 assignment or for other lawful purposes."  
9 Q Okay. You understand that one?  
10 A Kinda. 02:10:25  
11 Q What --  
12 A Promotion, retention.  
13 Q What holds you up?  
14 A Yeah. Okay. Yeah.  
15 Q Okay. All right. Let's -- and you 02:10:38  
16 understand --  
17 Okay. Keep going. Let's just -- we'll  
18 finish here.  
19 A "I authorize, without reservation, any  
20 party or agency contacted by 7-Eleven to furnish the 02:10:49  
21 above-mentioned information; and also understand  
22 that any offer of employment made by 7-Eleven, Inc.,  
23 may be revoked if unapplicable information is found  
24 in an investigative report" -- or no -- "background  
25 inquiry or consumer report at any time after my 02:11:12

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1 employment has already begun subject to applicable  
2 law."

3 Q Okay. You understand that one?

4 A Yeah.

5 Q Okay. You see in there a few times it says 02:11:23  
6 "I consent" or "I authorize." You understand what  
7 that means; right?

8 A Yes.

9 Q You understand this was 7-Eleven's attempt  
10 at getting your authorization to run a report that 02:11:34  
11 may include --

12 A Sterling.

13 Q -- stuff about -- yeah, well, Sterling to  
14 run it on behalf of 7-Eleven, you're right, good  
15 catch, to run a report that may include stuff about 02:11:47  
16 your character, characteristics, driving history,  
17 credit history, all those things we read; right?

18 A Yes.

19 Q You understand that?

20 A Yeah. Now I do, yeah. 02:11:59

21 Q Okay. And we spent, I don't know, maybe  
22 10, 15 minutes reading through this together;  
23 right?

24 A Yes.

25 Q And you understand what it says; right? 02:12:08

1 A Yes.

2 Q Okay. You understand the description of  
3 those reports; right?

4 A Yes.

5 Q And here electronic signature, I think we 02:12:18  
6 talked about it already, but that information you  
7 either had to put in or it was populated? I can't  
8 remember what the answer was.

9 A Yes.

10 Q Okay. You didn't do anything to say I 02:12:31  
11 don't consent or I don't authorize it; right?

12 A Right.

13 Q Okay. And you can see why 7-Eleven would  
14 then feel like they had authorization to run a  
15 report; right? 02:12:48

16 A Yes.

17 Q You'll agree with me if you'd have spent  
18 the time to read through it, the 10, 15 minutes,  
19 whatever it took, you would have understood what  
20 these reports are, what they might look at; right? 02:13:03

21 A Kinda, yeah.

22 Q Yeah. Okay.

23 Let's go off the record for a minute or  
24 two.

25 Before we do, has there been anything in 02:13:36

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Hahn & Bowersock, A Veritext Company  
800.660.3187

1 Q Do you understand that you were terminated  
2 because of what they found in your criminal record  
3 search; right?

4 A Yes.

5 Q And so a basic criminal record search would 02:21:03  
6 have found that misdemeanor; correct?

7 A Yes.

8 Q So your understanding of a background  
9 search, that was okay for them to find; correct?

10 A Yes.

02:21:16

11 Q And what they found is what led to your  
12 termination; right?

13 A Yes.

14 Q And you have no knowledge whether or not  
15 they called your schools or they looked into your 02:21:24  
16 characteristics or your mode of living; correct?

17 A Yes.

18 Q Do you think it's fair that you didn't read  
19 this form, so you didn't understand it, and then you  
20 turn around and sue 7-Eleven for not reading the 02:21:43  
21 form?

22 MR. PELUSO: Objection as to the form.

23 THE WITNESS: What was that again?

24 BY MR. CHRISTENSEN:

25 Q Do you think it's fair to 7-Eleven, that 02:21:54

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1 CERTIFICATION OF COURT REPORTER

2 FEDERAL JURAT

3  
4 I, the undersigned, a Certified Shorthand  
5 Reporter of the State of California do hereby certify:

6 That the foregoing proceedings were taken  
7 before me at the time and place herein set forth; that  
8 any witnesses in the foregoing proceedings, prior to  
9 testifying, were placed under oath; that a verbatim  
10 record of the proceedings was made by me using machine  
11 shorthand which was thereafter transcribed under my  
12 direction; further, that the foregoing is an accurate  
13 transcription thereof.

14 That before completion of the deposition, a  
15 review of the transcript [X] was [ ] was not requested.

16 I further certify that I am neither  
17 financially interested in the action nor a relative or  
18 employee of any attorney of any of the parties.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name: March 5, 2019.

21  
22  
23 

24 Michelle Milan Fulmer  
25

CSR 6942, RPR, CRR, CRC

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# EXHIBIT B

1/23/2019

Fwd: 7-Eleven New Hire Paperwork - tsmith@woodrowpeluso.com - Woodrow & Peluso, LLC Mail

From: <[donotreply@equifax.com](mailto:donotreply@equifax.com)>  
Date: Wed, Jan 24, 2018, 10:45 AM  
Subject: 7-Eleven New Hire Paperwork  
To: <[eddiemunoz094@gmail.com](mailto:eddiemunoz094@gmail.com)>

EdwardO,

Welcome to 7-Eleven!

To ensure your career gets off to a great start, you must complete important payroll and new hire paperwork, which may be accessed at the [Employment Center](#) or by copying and pasting the following URL into your browser: <https://hrx.talx.com/EmploymentCenter/default.aspx?divisionid=284>

Please configure your web browser to **allow Pop-ups** for this site. You may need to turn your Pop-up Blocker off.

Use the following Login ID and Password for authentication:

**Login ID:** Eddie94

**Password:** Your 10 digit phone number (ex. 555-555-5555 without dashes or spaces)

In preparation for completing the forms, please gather your I-9 documents.

**Acceptable I-9 Documents**

Once logged in to Employment Center, carefully read the instructions at the top of each page. Your new hire paperwork should take approximately 30 minutes to complete. **It is essential that you complete all of the new hire documents.**

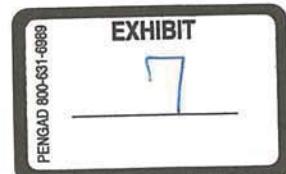
If you have any difficulty accessing the site or questions about the new hire documents, please contact HR at 1-888-886-1801, available Monday-Friday 7am-5pm CST.

And finally – check out our employee referral program [here](#). We're always looking for fresh talent to keep our global organization moving forward!

On behalf of 7-Eleven, we're happy to have you!

Thank you

Human Resources



MUNOZ000006

# EXHIBIT C

# Exhibit 1

Case 2:18-cv-03893-RGK-AGR Document 40-1 Filed 09/25/18 Page 2 of 5 Page ID #:265

1 Mike Arias (CSB #115385)  
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*\*Pro Hac Vice*

Attorneys for Plaintiff and the alleged Classes

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

**Edwardo Munoz**, individually and on behalf of all others similarly situated,

Case No. 2:18-cv-03893-RGK-AGR

**Plaintiff,**

V.

**7-Eleven, Inc.,** a Texas corporation,

Defendant.

## **DECLARATION OF EDWARDO MUÑOZ**

I, Edwardo Munoz, on oath declare as follows:

1. I am over the age of eighteen (18), and am the Plaintiff in the above-captioned action. I make this declaration in support of Plaintiff's Reply in Support of Plaintiff's Motion for Class Certification. I am able to testify to the matters set forth herein if called upon to do so. I make the following statements based upon my own personal knowledge.

**DECLARATION OF  
EDWARDO MUÑOZ**

- 1 -

Case 2:18-cv-03893-RGK-AGR Document 40-1 Filed 09/25/18 Page 3 of 5 Page ID #:266

### **1 | Circumstances Surrounding My Employment With 7-Eleven**

2       2. In or around January 2018, I applied for a position with 7-Eleven, Inc.  
3 at a store located in Los Angeles, California.

4       3. In connection with my employment application, I was required to  
5 complete the document entitled Disclosure Regarding Background Investigation  
6 (hereafter "Disclosure," a true and accurate copy of which is attached hereto as Ex.  
7 A.).

8       4. The Disclosure contained an excessive amount of information in fine  
9 print. As a result of the excessive information, I was confused as to both what the  
10 purpose of the Disclosure was and what it actually authorized.

11       5. Despite not understanding the nature of the information that would be  
12 disclosed, I chose to execute the Disclosure to continue with the application process.

6. Starting on January 26, 2018, I began my employment with 7-Eleven.

14       7.     Approximately one month later, on or around February 21, 2018, 7-  
15 Eleven informed me that I was terminated based upon information contained in my  
16 background check.

17       8. In short, had I understood the information that would be provided to 7-  
18 Eleven, I would not have signed the Disclosure.

19 Further affiant sayeth not.

09/25/2018

Date

Edwardo munoz

Edwardo Munoz

**DECLARATION OF  
EDWARDO MUNOZ**

# EXHIBIT A

Case 2:18-cv-03893-RGK-AGR Document 40-1 Filed 09/25/18 Page 5 of 5 Page ID #:268  
**Disclosure Regarding Background Investigation**

For the purpose of maintaining the safety and security of our stores, customers, employees and property, 7-Eleven, Inc. may order a "consumer report," "background report" or "investigative consumer report" on you in connection with your application for employment or your ongoing employment with 7-Eleven, Inc.

The consumer reporting agency, Sterling Talent Solutions, Inc. ("formerly known as TalentWise"), will prepare the report for 7-Eleven, Inc. Sterling Talent Solutions, Inc. is located at 19910 North Creek Parkway, Suite 200, Bothell, WA 98011, and can be reached at (877) 982-9888. Further information regarding Sterling Talent Solutions, including its privacy policy, may be found online at [www.sterlingtalentsolutions.com](http://www.sterlingtalentsolutions.com). 7-Eleven reserves the right to use a different service provider to obtain this information as it deems necessary. If a different agency is used, 7-Eleven will provide you with the contact information for the agency.

The report may contain information from federal, state and other agencies, learning institutions, information service bureaus, past/present employers, and other individuals or sources concerning your character, general reputation, personal characteristics, mode of living, work habits and/or credit standing. Such information may include your driving history, your credit history, your education history, records of military service, insurance claims involving you, your criminal history and your employment history, including the reasons for termination. The information contained in the report may be obtained from private and/or public record sources, and the investigation can also involve personal interviews with sources such as your current and past employers, friends, family members or associates. Information included in the report will only be requested when permitted by law and where such information is substantially related to the duties and responsibilities of the position for which you are applying. 7-Eleven, Inc. will not obtain information about your credit history, credit worthiness, credit standing, or credit capacity unless permitted by applicable State and local law. You have the right, upon written request made within a reasonable time after receipt of this notice, to request disclosure of the nature and scope of any investigative consumer report from 7-Eleven, Inc.

The Fair Credit Reporting Act provides you with specific rights in dealing with consumer reporting agencies. You will find these rights in A Summary of Your Rights Under the Fair Credit Reporting Act, available at [http://files.consumerfinance.gov/f/022014\\_cfpb\\_summary-rights-FCRA.pdf](http://files.consumerfinance.gov/f/022014_cfpb_summary-rights-FCRA.pdf). State statutory provisions may also provide additional protections for consumer reports.

## **Background Check Authorization**

I have carefully read and understand the preceding Disclosure and the below Authorization form. In connection with and for the duration of my employment (including contract for services) with 7-Eleven, Inc., I authorize and understand that investigative background inquiries and/or consumer report inquiries may be made about me to the extent permitted by applicable federal, state, and local laws. In connection with these inquiries, I consent that 7-Eleven, Inc., may obtain consumer, criminal, driving, education, employment and other reports at any time prior to and/or during my employment to the extent permitted by applicable law. These reports may include information as to my character, general reputation, personal characteristics, mode of living, work habits, credit standing, driving history, credit history, education history, military service record, criminal history and employment history, including the reasons for termination. Further, I understand that, and hereby authorize, 7-Eleven, Inc. to request information from various federal, state and other agencies, learning institutions, information service bureaus, past/present employers, and other individuals or sources which maintain information concerning my past activities. These reports may relate to my driving record, criminal record, credit, civil and other experiences, as well as information in the files of insurance companies pertaining to claims involving me.

By electronically signing below, I consent to the preparation of background reports by Sterling Talent Solutions, and to the release of such reports to 7-Eleven, Inc. and its designated representatives for the purpose of assisting 7-Eleven, Inc. in making a determination as to my employment, promotion, retention, contract assignment or for other lawful purposes. I authorize, without reservation, any party or agency contacted by 7-Eleven, Inc. to furnish the above mentioned information; and also understand that any offer of employment made by 7-Eleven, Inc. may be revoked if unacceptable information is found in an investigative background inquiry or consumer report at any time after my employment has already begun subject to applicable law.

Date of birth is being requested in order to obtain accurate retrieval of records. If you do not wish to indicate your birth date on this form, you may confidentially submit it to the reporting agency by calling toll free (877) 982-9888.

## **Electronic Signature**

I have carefully read and understand this notice and authorization form.

<b>First Name:</b>	Edwardo
<b>Full Middle Name:</b>	L
<b>Last Name:</b>	Munoz
<b>Address:</b>	2196 Yosemite parkway Merced, CA 95341
<b>Email Address:</b>	eddiemunoz094@gmail.com
<b>Date of Birth:</b>	11/24/1994
<b>Social Security Number:</b>	[REDACTED]

This is an electronic signature and is given in accordance with U.S. federal regulations governing the legal and binding effectiveness of electronic signatures.

## **A Summary of Your Rights Under the Fair Credit Reporting Act**

Para información en español, visite [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) o escriba a la Consumer Financial Protection Bureau, 1700 G Street N.W.,

**Tabitha Muncey**

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**From:** cacd\_ecfmail@cacd.uscourts.gov  
**Sent:** Monday, April 8, 2019 3:38 PM  
**To:** ecfnef@cacd.uscourts.gov  
**Subject:** Activity in Case 2:18-cv-03893-RGK-AGR Edwardo Munoz v. 7-Eleven, Inc. Motion for Summary Judgment

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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**Notice of Electronic Filing**

The following transaction was entered by Trotter, Julie on 4/8/2019 at 3:37 PM PDT and filed on 4/8/2019

**Case Name:** Edwardo Munoz v. 7-Eleven, Inc.

**Case Number:** [2:18-cv-03893-RGK-AGR](#)

**Filer:** 7-Eleven, Inc.

**Document Number:** [67](#)

**Docket Text:**

**NOTICE OF MOTION AND MOTION for Summary Judgment as to As to All Claims in Plaintiff's Complaint filed by Defendant 7-Eleven, Inc.. Motion set for hearing on 5/13/2019 at 09:00 AM before Judge R. Gary Klausner. (Attachments: # (1) Defendant's Statement of Uncontroverted Facts and Conclusions of Law in Support of Motion for Summary Judgment, # (2) Request for Judicial Notice in Support of Defendant's Motion for Summary Judgment, # (3) Exhibit A-E to Request for Judicial Notice in Support of Defendant's Motion for Summary Judgment, # (4) Declaration of Julie R. Trotter in Support of Defendant's Motion for Summary Judgment, # (5) Exhibit A-C to Declaration of Julie R. Trotter in Support of Defendant's Motion for Summary Judgment, # (6) Declaration of Kristin Cope in Support of Defendant's Motion for Summary Judgment, # (7) Exhibit A-C to Declaration of Kristin Cope in Support of Defendant's Motion for Summary Judgment, # (8) Proposed Judgment in Favor of Defendant Following Court's Decision to Grant Defendant's Motion for Summary Judgment) (Trotter, Julie)**

**2:18-cv-03893-RGK-AGR Notice has been electronically mailed to:**

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**2:18-cv-03893-RGK-AGR Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** C:\fakepath\Defs MSJ - Notice and Motion.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-0]  
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**Document description:** Defendant's Statement of Uncontroverted Facts and Conclusions of Law in Support of Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - SOUF.pdf

**Electronic document Stamp:**

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**Document description:** Request for Judicial Notice in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - RJP.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-2]  
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**Document description:** Exhibit A-E to Request for Judicial Notice in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - RJP (Exhibits A-E) - final.pdf

**Electronic document Stamp:**

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**Document description:** Declaration of Julie R. Trotter in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - Dec of J. Trotter.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-4]  
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**Document description:** Exhibit A-C to Declaration of Julie R. Trotter in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - Dec of J. Trotter (Exhibits A-C) - final.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-5]  
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**Document description:** Declaration of Kristin Cope in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - Dec of K. Cope.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-6]  
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**Document description:** Exhibit A-C to Declaration of Kristin Cope in Support of Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - Dec of K. Cope (Exhibits A-C) - final.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-7]  
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8fa90d677e79e3b81d806f4a92a67b6012685062be68a135a88e738a39ab]]

**Document description:** Proposed Judgment in Favor of Defendant Following Court's Decision to Grant Defendant's Motion for Summary Judgment

**Original filename:** C:\fakepath\Defs MSJ - Proposed Judgment.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/8/2019] [FileNumber=27430827-8]  
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